

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

CIVIL ACTION NO. 04-10986 NG

ULYSSES RODRIGUEZ CHARLES,
Plaintiff,

v.

CITY OF BOSTON, et. al.,
Defendants.

DEFENDANT, STANLEY BOGDAN'S MOTION TO DISMISS

The plaintiff brings several causes of action against the Defendant, Stanley Bogdan and numerous others, alleging various civil rights. Pursuant to Fed. Civ. R. 12(b)(6), the Defendant, Stanley Bogdan ("Defendant Bodgan") moves to dismiss all counts of the Plaintiff's Complaint. In support of said motion, the Defendant submits the attached Memorandum.

WHEREFORE the Defendant, Stanley Bogdan, moves this Honorable Court to dismiss all allegations and claims against him as contained in the Plaintiff's Complaint.

DEFENDANT REQUESTS AN ORAL ARGUMENT FOR THIS MOTION

Respectfully submitted,

DEFENDANT, STANLEY BOGDAN,
Merita A. Hopkins
Corporation Counsel

By his attorneys:

/s/ Amy E. Ambarik
Amy E. Ambarik, Esq., BBO# 637348
Thomas R. Donohue, Esq., BBO# 643483
Assistant Corporation Counsel
City of Boston Law Department
Room 615, City Hall
Boston, MA 02201
(617) 635-4099 (Ambarik)
(617) 635-4039 (Donohue)